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Adam Raethke

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ROBERT BARROR,

Case No. 3:20-cv-00731-SB

Plaintiff,

v.

CITY OF SAINT HELENS, and ADAM
RAETHKE, in his individual capacity,

Defendants.

**DECLARATION OF JEFFREY
HANSEN IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Jeffrey Hansen, declare as follows:

1. I am one of the attorneys for Defendants City of St. Helens and Officer Adam Raethke ("Defendants"). I make this Declaration in support of Defendants' Motion for Summary Judgment. This Declaration is based on personal knowledge. I am competent to testify to the matters stated herein.

2. Attached as Exhibit 1 is a true and accurate copy of Defendant Adam Raethke's deposition transcript.

3. Attached as Exhibit 2 is a true and accurate copy of Trooper Christopher Cowen's deposition transcript.

4. Attached as Exhibit 3 is a true and accurate copy of the CCOM dispatch transmitted to Officer Raethke in relation to the incident giving rise to this lawsuit.

5. Attached as Exhibit 4 is the dash cam footage of the incident, taken from the vehicle driven by the Columbia County Troopers.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND ACCURATE.

DATED this 22nd day of November, 2022.

CHOCK BARHOUM LLP



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